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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	CRIMINAL INDICTMENT
)	
PLAINTIFF,)	Case No. 2:15-cr- 30 /
)	
VS.)	VIOLATIONS:
)	18 U.S.C. § 2252A(a)(2) & (b)
BRIAN MICHAEL BREWER,)	RECEIPT OF CHILD
)	PORNOGRAPHY (1 count); and
DEFENDANT.)	18 U.S.C. § 2252A(a)(5)(B)
)	POSSESSION OF CHILD
)	PORNOGRAPHY
)	(1 count)
)	
)	

THE GRAND JURY CHARGES THAT:

At all relevant times

COUNT ONE

Receipt of Child Pornography

Beginning on a date unknown and continuing through on or about September 24, 2015, in the State and Federal District of Nevada and elsewhere,

BRIAN MICHAEL BREWER,

defendant herein, did knowingly receive child pornography and any material that

contains child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been shipped and transported using any means and facility of interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT TWO

Possession of Child Pornography

Beginning on a date unknown and continuing through on or about September 24, 2015, in the State and Federal District of Nevada, and elsewhere,

BRIAN MICHAEL BREWER,

defendant herein, did knowingly possess and knowingly access with intent to view material which contains child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and effecting affecting interstate and foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION ONE

*Receipt or Distribution of Child Pornography
and Possession of Child Pornography*

1. The allegations contained in Counts One and Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1).

2. Upon conviction of any of the felony offenses charged in Counts One and Two of this Criminal Indictment,

BRIAN MICHAEL BREWER,

defendant herein, shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Section 2252A(a)(2) and 2252A(a)(5)(B), or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Section 2252A(a)(2) and 2252A(a)(5)(B):

- a. Toshiba laptop computer, Serial number XB051668Q;
- b. Kingston 32GB USB drive; and
- c. Samsung Galaxy 4 cellphone and SD card.

All pursuant to Title 18, United States Code, Sections 2252A(a)(2), 2252A(a)(5)(B), and 2253(a)(1).

FORFEITURE ALLEGATION TWO

*Receipt or Distribution of Child Pornography
and Possession of Child Pornography*

1. The allegations contained in Counts One and Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One and Two of this Criminal Indictment,

BRIAN MICHAEL BREWER,

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of

1 violations of Title 18, United States Code, Section 2252A(a)(2) and 2252A(a)(5)(B) or
2 any property traceable to such property:

- 3 a. Toshiba laptop computer, Serial number XB051668Q;
4 b. Kingston 32GB USB drive; and
5 c. Samsung Galaxy 4 cellphone and SD card.


6 All pursuant to Title 18, United States Code, Sections 2252A(a)(2),
7 2252A(a)(5)(B), and 2253(a)(3).

8 **DATED:** this 27th day of October, 2015.

9 **A TRUE BILL:**

10
11 /s/
12 FOREPERSON OF THE GRAND JURY

13 DANIEL G. BOGDEN
14 United States Attorney

15  for
16 ALLISON L. HERR
17 Special Assistant United States Attorney
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